

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: David D. Douglas  
Autumn N. Douglas

Debtor(s)

JP MORGAN CHASE BANK, NATIONAL  
ASSOCIATION

Movant

v.

David D. Douglas  
Autumn N. Douglas

Respondents

and  
Ronda J. Winnecour, Trustee

Additional Respondents

BK. NO. 20-70304 JAD

CHAPTER 13

**RESPONSE MOTION OF JP MORGAN CHASE BANK, NATIONAL  
ASSOCIATION**

**FOR RELIEF FROM THE AUTOMATIC STAY**

Respondent by its Attorney, Willis & Associates., hereby files the following Response to the Motion seeking termination of the Automatic Stay and leave to foreclose on its mortgage on real property owned by Debtor(s).

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied Debtor is without sufficient knowledge as to what Movant wishes, by way of further response payment are being made wage attachment via Chapter 13 Trustee.
6. Denied Debtor is without sufficient knowledge as to current payoff.
7. Denied that Debtors are currently delinquent in payments to the Chapter 13 Trustee in the amount of \$1,968.00. Per the trustee network arrears as of 10/31/2020 were \$519.00.  
(November payment is not due)
8. Denied Debtor's payments are being made per wage attachment via Chapter 13 Trustee.
9. Denied that Debtors are currently delinquent in payments to the Chapter 13 Trustee in the
10. amount of \$1,968.00. Per the trustee network arrears as of 10/31/2020 were \$519.00.
11. (November payment is not due)

12. Admitted.
13. Admitted.
14. Admitted.
15. Denied by way of further response payment are being made per wage attachment via Chapter 13 Trustee.
16. Denied by way of further response payment are being made wage attachment via Chapter 13 Trustee.
17. Legal conclusion to which no response is required.

WHEREFORE, Respondent respectfully requests that this Court enter an Order Denying the Motion for Relief from the Automatic Stay.

Date: November 6, 2020

/s/ Lawrence Willis, Esquire  
**Lawrence W. Willis**  
PA85299  
Willis & Associates 201  
Penn Center Blvd Suite  
310  
Pittsburgh, PA 15235  
412-235-1721  
Email: [ecf@westernpabankruptcy.com](mailto:ecf@westernpabankruptcy.com)